

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

DOLORES LOZANO,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	6:16-CV-403-RP
	§	
BAYLOR UNIVERSITY; ART BRILES,	§	
In his individual capacity;	§	
IAN MCCAW, in his individual capacity;	§	
and CITY OF WACO,	§	
	§	
Defendants.	§	

**DEFENDANT ART BRILES'  
PROPOSED VOIR DIRE QUESTIONS**

1. Knowledge of Parties and Attorneys

- Who here has heard of the Defendant in this case: Art Briles?
- How have you heard of Art Briles?
  - Where did you hear the information?
  - Any opinions about Art Briles?
  - Any negative feelings about Art Briles?
  - Would that affect your ability to be fair and impartial?
- Has anyone (or everyone), heard stories, news articles or heard people talk about Baylor and Coach Briles over the last 7 years?
  - What stories have they heard?
  - Have they come here today with a formed opinion from what they have already heard?
  - Are they able to separate whatever they have heard, and judge this case on the issues concerning only Ms. Lozano in this case and her claims against Baylor, Art Briles, and McCaw?
  - If not, question further as to their concerns.

- Are any Baylor students? Any attended football games for or against Baylor?
  - Any student athletes?
  - Anything about your experience at Baylor that would make you unable to be fair to Coach Briles?
  - Anything about your experience or impression of college athletics that would make it hard for you to be fair to Coach Briles?
- Have you heard of or know of the Plaintiff, Dolores Lozano?
  - How or where did you hear of her?
  - Has anyone heard or read about the claims she is making in any newspaper, blog, television news show, or other source about her claims in her suit against Baylor, Coach Briles, and Ian McCaw?
  - What have you heard? Who did you hear it from? Would what you heard or saw make it hard for you to be fair to Coach Briles in this case before you have heard any evidence?
  - Has anyone already made up their minds about the claims of Ms. Lozano before they came into Court today, if they had heard of them previously? If so, explain.
- Do you know of any of the counsel or law firm for the plaintiff, Dolores Lozano?
  - Sheila Haddock, from the Zalkin Law Firm?
  - Zeke Otis Fortenberry from the Fortenberry Firm?
  - Explain your knowledge of counsel or any personal experience with the firm.
- Do you know of any counsel for Mr. Briles, including?
  - The Law firm of Hartline Barger?
    - Darrell Barger
    - Colin Powell
    - David Green
  - Reid Simpson of Yetter Coleman.

- Ernest Cannon of the Law of Office of Ernest Cannon.
- Explain how or under what circumstances you know counsel.

2. General Questions

- Next I will ask about where you get your news. Please raise your hand if you get your news from any of the following sources:
  - Twitter
  - Facebook
  - TikTok
  - Reddit
  - Other social media
  - Local news broadcasts
  - InfoWars
  - CNN
  - Fox News
  - MSNBC
  - Newsmax
  - CNBC
  - One America News or OAN
  - New York Times
  - Washington Post
  - NPR
- Has anyone seen the following television programs:
  - Hard Knocks
  - Swamp Kings

3. Thoughts on litigation?

- Have you or a close family member ever been sued?
  - Individually or as a business owner?
  - General explain the circumstances of the suit.
  - What was your experience?
  - Do you harbor any feelings about litigation as part of your experience that would make it difficult to be fair in this case?
- Has anyone here been a victim of domestic violence? Reserve for further questions, any hands raised.
- Anyone have a friend or relative who has made a complaint or filed charges related to a domestic violence incident?
- Has anyone had an argument or disagreement with their spouse or significant other?
- Does anyone here believe that, just because a lawsuit was filed, the defendant probably did something wrong?
  - Has everyone heard there are two sides to every story?
  - Does everyone understand that Plaintiff has the burden of proof in this case?
  - Despite that, is there anyone who believes the defendant has to prove something to you in this case?

4. Documentation

- Who here who does not believe that if someone comes into Court requesting money, then they should have to prove it with evidence to support their claims?

5. Based upon the information you have been provided so far, is there anything that would cause you to be biased in favor of or against any of the parties in this case?

Would this prevent you from fairly reviewing the evidence so that you could not fairly determine a verdict in this case?

Respectfully submitted,

/s/ Colin L. Powell

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**ATTORNEYS FOR DEFENDANT**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of this document is being served pursuant to the Federal Rules of Civil Procedure on September 15, 2023.

*/s/ Colin L. Powell*

**COLIN L. POWELL**